

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

Mary Yearwood,

Plaintiff,

v.

San Antonio Housing Authority,

Defendant.

Case No.: 5:20-cv-00709

**ORIGINAL COMPLAINT FOR:
Violations of False Claims Act, 31 U.S.C. §
3730(h) and Wrongful Termination**

JURY TRIAL DEMANDED

PLAINTIFF'S ORIGINAL COMPLAINT

Plaintiff Mary Yearwood files this Original Complaint against San Antonio Housing Authority (“SAHA” or “Defendant”), and alleges as follows:

I. INTRODUCTION

1. Plaintiff, Mary Yearwood brings this action pursuant to the retaliation provisions of the federal False Claims Act and the *Sabine Pilot* doctrine. This action concerns Plaintiff's investigations and efforts to stop false and fraudulent statements, reports and claims for payment that Defendant routinely and intentionally submitted to federal housing programs, and Plaintiff's refusal to commit illegal acts.

2. Plaintiff seeks damages as a result of Defendant's retaliation against her in violation of the anti-retaliation provisions of the FCA, 31 U.S.C. §§ 3730(h), and the *Sabine Pilot* doctrine.

II. THE PARTIES

3. Plaintiff Mary Yearwood, at all relevant times, was a citizen of Texas, residing in San Antonio, Bexar County, Texas.

4. San Antonio Housing Authority is a domestic quasi-governmental corporation that can be served via its registered agent for service, San Antonio Housing Authority, 818 S. Flores, San Antonio, TX 78204.

III. JURISDICTION AND VENUE

5. This Court has subject matter jurisdiction over this action pursuant to 28 U.S.C. § 1331 and 1345, and supplemental jurisdiction to entertain common law or equitable claims pursuant to 28 U.S.C. § 1337(a).

6. This Court has personal jurisdiction over the Defendant pursuant to 31 U.S.C. § 3732(a). Jurisdiction is proper over the Defendant because the Defendant can be found in, resides in, and/or has transacted business within this Court's jurisdiction, and some of the acts giving rise to Plaintiff's claims occurred within this district.

7. Venue is proper in this district under 28 U.S.C. §§ 1331(b)-(c), and 31 U.S.C. § 3732(a) because the Defendant resides in or transacts business in this district and because a substantial portion of the events or omissions giving rise to the claims alleged herein occurred in this district.

8. Plaintiff is familiar with Defendant's retaliatory practices alleged in this Complaint and is aware that the pervasive misconduct at issue occurred in this District.

IV. THE FALSE CLAIMS ACT

9. The FCA reflects Congress's objective to "enhance the Government's ability to recover losses as a result of fraud against the Government." S. Rep. No. 99-345, at 1 (1986). The FCA establishes treble damages liability for an individual or entity that: "knowingly presents, or causes to be presented, a false or fraudulent claim for payment or approval," 31 U.S.C. § 3729(a)(1)(A); or "knowingly makes, uses, or causes to be made or used, a false record or



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APPLICATION NO.	FILING DATE	FIRST NAMED INVENTOR	ATTORNEY DOCKET NO.	CONFIRMATION NO.
09/814,226	03/21/2001	Takehiko Miyazaki	FUJI 18.488	2007
026304	7590	12/27/2005	EXAMINER	
KATTEN MUCHIN ROSENMAN LLP 575 MADISON AVENUE NEW YORK, NY 10022-2585				SINGH, RAMNANDAN P
ART UNIT		PAPER NUMBER		
		2646		

DATE MAILED: 12/27/2005

Determination of Patent Term Adjustment under 35 U.S.C. 154 (b) (application filed on or after May 29, 2000)

The Patent Term Adjustment to date is 884 day(s). If the issue fee is paid on the date that is three months after the mailing date of this notice and the patent issues on the Tuesday before the date that is 28 weeks (six and a half months) after the mailing date of this notice, the Patent Term Adjustment will be 884 day(s).

If a Continued Prosecution Application (CPA) was filed in the above-identified application, the filing date that determines Patent Term Adjustment is the filing date of the most recent CPA.

Applicant will be able to obtain more detailed information by accessing the Patent Application Information Retrieval (PAIR) WEB site (<http://pair.uspto.gov>).

Any questions regarding the Patent Term Extension or Adjustment determination should be directed to the Office of Patent Legal Administration at (571) 272-7702. Questions relating to issue and publication fee payments should be directed to the Customer Service Center of the Office of Patent Publication at (703) 305-8283.